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August 16, 2018

VIA ECF

Hon. Steven M. Gold
United States District Court
Eastern District New York
225 Cadman Plaza
Brooklyn, New York 11201

Re.: *Allstate Ins. Co., et al. v. 21st Century Pharmacy, Inc., et al.*
Docket No.: 17-CV-03731 (WFK)(SMG); File No. L2597

Dear Judge Gold:

The Russell Friedman Law Group, LLP represents Defendants 21st Century Pharmacy, Inc. and Albert Alishayev ("Defendants") in connection with the above-referenced matter. Please accept this correspondence as a joint application of all parties for a short continued stay of all discovery, motions, and deadlines.

As this Court may recall, on August 6, 2018, the parties had initially requested a stay of all proceedings in an effort to devote all their energy in the exploration of settlement. (DE 74) In furtherance of same, the parties have conducted multiple phone conferences and proffered written correspondences containing proposed settlement structures. Additionally, both parties have employed experts to construct/review various settlement structures. As a direct result of said efforts, significant progress has been made toward possible settlement. However, due to the complexities of this matter, the parties have been unable to fully vet all of the possible settlement alternatives.

Prior to the filing of the instant application, the parties conferred and formulated what we believe is a viable path forward. During said conference, the parties discussed at length the timeframes which we estimate will be required to complete the settlement negotiations and settlement products which have been exchanged thus far. As a result of same, the parties respectfully request the Court's indulgence for an extension of the previously granted stay until September 10, 2018. At that time, the parties will either be notifying this Court the matter has been resolved or submitting a status memo setting forth deadlines for the motions and discovery matters which are presently stayed pursuant to this Court's previous Order.



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Stay of Discovery Motion
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Thank you for your time and consideration in this regard.

Respectfully,
THE RUSSELL FRIEDMAN LAW GROUP, LLP

By: /S/ Charles Horn
Charles Horn

CH/dm

cc: Michael W. Whitcher, Esq. (*Via ECF Only*)